

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TIMOTHY KING, MARIAN ELLEN
SHERIDAN, JOHN EARL HAGGARD,
CHARLES JAMES RITCHARD, JAMES
DAVID HOOPER, and DARREN WADE
RUBINGH,

Plaintiffs,

v

No. 2-20-cv-13134

HON. LINDA V. PARKER

MAG. R. STEVEN WHALEN

GRETCHEN WHITMER, in her official
capacity as Governor of the State of
Michigan, JOCELYN BENSON, in her
official capacity as Michigan Secretary of
State and the Michigan BOARD OF STATE
CANVASSERS,

Defendants,

CITY OF DETROIT,
Proposed Intervening Defendant,

ROBERT DAVIS,
Proposed Intervening Defendant,

DEMOCRATIC NATIONAL
COMMITTEE and MICHIGAN
DEMOCRATIC PARTY,
Proposed Intervening Defendant.

**DEFENDANTS WHITMER
AND BENSON'S EX PARTE
MOTION TO EXCEED PAGE
LIMIT FOR MOTION FOR
SANCTIONS UNDER
28 U.S.C. § 1927**

Sidney Powell (Texas Bar No. 16209700)
Attorney for Plaintiffs
Sidney Powell, P.C.
2911 Turtle Creek, Blvd
Dallas, TX 75219
(517) 763-7499
sidney@federalappeals.com

Stefanie Lambert Junttila (P71303)
Attorney for Plaintiffs
500 Griswold Street, Suite 2340
Detroit, MI 48226
(313) 963-4740
attorneystefanielambert@gmail.com

Scott Hagerstrom (P57885)
Attorney for Plaintiffs
222 West Genesee
Lansing, MI 48933
(517) 763-7499
Scotthagerstrom@yahoo.com

Gregory J. Rohl (P39185)
Attorney for Plaintiffs
41850 West 11 Mile Road, Suite 110
Novi, Michigan 48375
248.380.9404
gregoryrohl@yahoo.com

Heather S. Meingast (P55439)
Erik A. Grill (P64713)
Assistant Attorneys General
Attorneys for Defendants
PO Box 30736
Lansing, Michigan 48909
517.335.7659
meingasth@michigan.gov
grille@michigan.gov

David Fink (P28235)
Attorney for Proposed Intervenor City of Detroit
38500 Woodward Avenue, Suite 350
Bloomfield Hills, Michigan 48304
248.971.2500
dfrink@finkbressack.com

Mary Ellen Gurewitz (P25724)
Attorney for Proposed Intervenor DNC/MDP
423 North Main Street, Suite 200
Royal Oak, Michigan 48067
313.204.6979
maryellen@cummingslawpllc.com

Scott R. Eldridge
Attorney for Proposed Intervenor DNC/MDP
One Michigan Avenue, Suite 900
Lansing, Michigan 48933
517.483.4918
eldridge@millercanfield.com

Andrew A. Paterson (P18690)
Attorney for Proposed Intervenor Davis
2893 East Eisenhower Parkway
Ann Arbor, Michigan 48108
248.568.9712
Aap43@outlook.com

**DEFENDANTS WHITMER AND BENSON’S EX PARTE MOTION TO
EXCEED PAGE LIMIT FOR MOTION FOR SANCTIONS UNDER
28 U.S.C. § 1927**

Now come Defendants Governor Gretchen Whitmer and Secretary of State Jocelyn Benson, by counsel, and request that this Court allow Defendants to file a brief in support of their motion for sanctions that exceeds the 25-page limit established by L.R. 7.1(d)(3)(A) for good cause shown in light of the important nature of this elections case. In support thereof, Defendants state:

1. Because the legal questions before this Court require the discussion of multiple factors, along with an application of the law to the facts, Defendants require additional pages to adequately make these arguments.
2. Defendants’ brief is 31 pages in length.

WHEREFORE, due to the important nature of this case and the legal questions presented, Defendants' request to extend the page length to 31 pages is warranted and reasonable in this case.

Respectfully submitted,

DANA NESSEL
Attorney General

s/Heather S. Meingast
Heather S. Meingast (P55439)
Erik A. Grill (P64713)
Assistant Attorneys General
Attorneys for Defendants
P.O. Box 30736
Lansing, Michigan 48909
517.335.7659
Email: meingasth@michigan.gov
P55439

Dated: January 28, 2021

Certificate of Service

I hereby certify that on January 28, 2021, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

s/Heather S. Meingast
Heather S. Meingast (P55439)
Assistant Attorney General
P.O. Box 30736
Lansing, Michigan 48909
517.335.7659